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**From:** Davis, Kable [Davis.Kable@epa.gov]  
**Sent:** 6/21/2019 6:31:04 PM  
**To:** Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]  
**CC:** Goodis, Michael [Goodis.Michael@epa.gov]  
**Subject:** FW: New AAPCO Section 24(c) information block on website  
**Attachments:** AAPCO SFIREG POM Section 24c Draft May 2019.docx

Hi Dan –

I wanted to pass this along to you so that you would see that Rose sent this document around to everyone in SFIREG/AAPCO and is stating that we are currently reviewing it.

We can chat about it on Monday.

Thanks much,  
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**From:** Fitz, Nancy  
**Sent:** Thursday, June 20, 2019 12:30 PM  
**To:** Davis, Kable <Davis.Kable@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>  
**Subject:** FW: New AAPCO Section 24(c) information block on website

FYI

Nancy Fitz  
Minor Use Team Leader  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
phone: 703-305-7385  
email: [fitz.nancy@epa.gov](mailto:fitz.nancy@epa.gov)  
web site: <https://www.epa.gov/pesticide-registration/minor-uses-and-grower-resources>

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**From:** Amy Sullivan <[aapco.sfireg@gmail.com](mailto:aapco.sfireg@gmail.com)>  
**Sent:** Thursday, June 20, 2019 12:16 PM  
**To:** Amy Sullivan <[aapco.sfireg@gmail.com](mailto:aapco.sfireg@gmail.com)>  
**Subject:** New AAPCO Section 24(c) information block on website

The Association of American Pesticide Control Officials (AAPCO) is creating a new information block on our website regarding Section 24(c)s, and AAPCO is requesting your input.

At this time, you will see a copy of the Draft AAPCO/SFIREG/POM proposed FIFRA Section 24(c) Guidance posted. Note - the comment period is closed, but if you have questions, please contact AAPCO. The Draft is currently under EPA review.

You will also see letters from NASDA, AAPCO and a few SLA regarding the issue that EPA is now re-evaluating its approach to reviewing 24(c) requests and the circumstances under which it will exercise its authority to disapprove those requests.

Request from AAPCO: If you have submitted a letter to EPA regarding the proposed re-evaluation, would you please forward a copy to Amy Sullivan ([aapco.sfireg@gmail.com](mailto:aapco.sfireg@gmail.com)).

AAPCO Reminder: Some of the current differences of opinion between EPA and many SLAs centers around the concept of “new uses” and what constitutes a “new use”, and this issue was illuminated with the dicamba Section 24(c)s that provided risk reduction restrictions. However, it is important to remember that there are other Section 24(c)s which are unrelated to the dicamba issue that have been approved by states for the exclusive purpose of providing restrictions which protect the environment.

Thank you.

Rose Kachadoorian  
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Pesticides Program Manager,  
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